

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.,

Plaintiff,

V.

C.A. No. 04-10353-PBS

VOICE SIGNAL TECHNOLOGIES, INC.,  
LAURENCE S. GILLICK, ROBERT S.  
ROTH, JONATHAN P. YAMRON, and  
MANFRED G. GRABHERR,

Defendants.

## DECLARATION OF WENDY S. PLOTKIN

Wendy S. Plotkin deposes and states as follows:

1. I am an attorney in the law firm of Choate, Hall & Stewart, and a member of the bar of the Supreme Judicial Court of the Commonwealth of Massachusetts and the United States District Court for the District of Massachusetts. I am counsel to the above-named defendants and make this declaration in support of the Voice Signal Technologies' Sur-Reply in Further Support of Opposition to ScanSoft's Motion to Compel Production of Complete "First-Year" Source Code and for Sanctions.

2. On February 28, 2006, ScanSoft's designated counsel Brad Lawrence called me to ask where the source code for the ELVIS "demo" was located on the laptop provided to ScanSoft. I informed him of the names of the ELVIS "demo" recognizer source code files and where they were located on the laptop. I did not receive any additional inquiries from ScanSoft's counsel on this issue.

\* \* \*

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

/s/ Wendy S. Plotkin

Dated: March 9, 2006